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FILED
DISTRICT COURT OF GUAM

MAR 17 2003

MARY
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7 Attorneys for Defendants:
8 *JAMES JI ENTERPRISES, INC. ET AL.*

9
10 IN THE DISTRICT COURT OF GUAM

11 ALICE N. SALAS,) CIVIL CASE NO. CV02-00002
12))
13 Plaintiff,))
14 v.))DEFENDANTS' PRETRIAL DISCLOSURES
15)) PURSUANT TO RULE 26(a)(3)
16 JAMES JI ENTERPRISES, JJ PACIFIC)
17 DEVELOPMENT CORPORATION,)
18 JAMES JI AND HYUNG LEE,)
19))
20 Defendant.))
21

22 DEFENDANTS' PRETRIAL DISCLOSURES PURSUANT TO RULE 26(a)(3)

23 Come Now, the Defendants James Ji Enterprises, JJ Pacific Development Corporation, James
24 Ji and Hyung Lee, through counsel undersigned, and make the following Pretrial Disclosures
25 pursuant to F.R.C.P. 26(a)(3).

26 I. WITNESSES

27 The Defendant believes that the following individuals have knowledge about the claims and
28 defenses in the above entitled action.

29 1. Alice Salas.

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ORIGINAL

2. Hyung Lee.
3. Felix Pangelinan.
4. Bennett Garcia.
5. James Ji.
6. Ann Cruz.
7. Jaime, the Defendant's office secretary.
8. George Salas.
9. John Hudnall.
10. Mr. Cheisman.

II. EXHIBITS

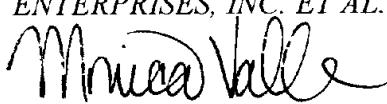
1. All deposition exhibits of November 22, 2002, including but not limited to, "A", "B", "C" with its sub-exhibits "1", "2", "3" and "4", "D", "E", "F", "G", "H" and "I".
2. Copies of payroll checks received by Plaintiff Salas.
3. Plaintiff's letter of resignation;
4. Receipt reflecting settlement payment of \$6,000.00;
5. Statement of settlement executed by Plaintiff

Dated this 17th day of March, 2003.

Respectfully submitted.

BERMAN O'CONNOR MANN & SHKLOV
Attorneys for Defendant JAMES JI
ENTERPRISES, INC. ET AL.

By:


MONICA VALLE
DANIEL J. BERMAN